FILED JASON M. FRIERSON 1 ENTERED COUNSEL/PARTIES OF DE United States Attorney Nevada Bar No. 7709 JEAN N. RIPLEY 5 2023 Assistant United States Attorney 3 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 CLERK US DISTRICT COUR Tel: (702) 388-6336 DISTRICT OF NEVADA Fax: (702) 388-6418 5 Jean.Ripley@usdoj.gov 6 Attorneys for the United States 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 8 9 UNITED STATES OF AMERICA, **CRIMINAL INDICTMENT** 10 Case No.: 2:23-cr-00/14-JAD-DJA Plaintiff, 11 VS. **VIOLATIONS:** 12 JOSHUA A. CORFEE, 18 U.S.C. § 844(e) – 13 Defendant. Threat and False Statement to Use an **Explosive Device** 14 18 U.S.C. § 2332a(a)(2) -15 Threatening to Use a Weapon of Mass Destruction 16 18 U.S.C. § 1038(a)(1)(A) – 17 False Information and Hoax 18 19 THE GRAND JURY CHARGES THAT: 20 **COUNT ONE** Threat and False Statement to Use an Explosive Device 21 (18 U.S.C. § 844(e)) 22 On or about February 26, 2023, in the State and Federal District of Nevada, 23 JOSHUA A. CORFEE, 24

defendant herein, through the use of a telephone, willfully made a threat and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made and to be made, to unlawfully to damage and destroy any building and other real and personal property at Harry Reid International Airport in Las Vegas, Nevada, by means of fire and an explosive, in and affecting interstate and foreign commerce, that is: the defendant called Harry Reid International Airport in Las Vegas, Nevada and stated that he had placed a bomb at the airport, knowing that statement to be false, in violation of Title 18, United States Code, Section 844(e).

## **COUNT TWO**

Threatening to Use a Weapon of Mass Destruction (18 U.S.C. § 2332a(a)(2))

On or about February 26, 2023, in the State and Federal District of Nevada,

## JOSHUA A. CORFEE,

defendant herein, acting without lawful authority, knowingly threatened to use a weapon of mass destruction, specifically, a bomb, against persons and property within the United States, by use of a facility of interstate and foreign commerce in furtherance of the offense, and by threatening property that was used in interstate and foreign commerce and in an activity that affected interstate and foreign commerce, and the offense and the results of the offense affected interstate and foreign commerce, in violation of Title 18, United States Code, Section 2332a(a)(2).

**COUNT THREE** 1 False Information and Hoax 2 (18 U.S.C. § 1038(a)(1)(A)) On or about February 26, 2023, in the State and Federal District of Nevada, 3 JOSHUA A. CORFEE, 4 defendant herein, did intentionally convey false and misleading information, to wit: that he 5 had placed a bomb at Harry Reid International Airport in Las Vegas, Nevada, under 6 circumstances where such information may reasonably have been believed, that indicated that an activity had taken, was taking, and would take place that would constitute a 7 violation of 18 U.S.C. § 2332a(a)(2) –Use of a Weapon of Mass Destruction, in violation of 8 Title 18, United States Code, Section 1038(a)(1)(A). 9 **DATED:** this 5<sup>th</sup> day of April, 2023. 10 A TRUE BILL: 11 12 /S/ FOREPERSON OF THE GRAND JURY 13 14 JASON M. FRIERSON 15 United States Attorney 16 17 N N. RIPLEY 18 Assistant United States Attorney 19 20 21 22 23 24